IN THE UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA ANDERSON DIVISION

Father Doe and Mother Doe, Individually, and as next of friend for John Doe, (a minor child),) Case No.:
Plaintiff,))
v. Singleton Investment Properties, LLC,)) PLAINTIFFS' ANSWERS TO LOCAL) RULE 26.01 INTERROGATORIES
Defendant.))

Plaintiffs, by and through their undersigned counsel, hereby answers Local Civil Rule 26.01 Interrogatories as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: Plaintiffs do not know of any subrogation interest involved in this case.

B. As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiffs demands a jury trial on all causes of action.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of the ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: N/A.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

ANSWER: Plaintiffs filed this action in the Anderson division as it is where a substantial part of the events and omissions giving rise to the claim occurred.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

Yes. This matter is related in part to Father Doe and Mother Doe, Individually, and as next of friend for John Doe, (a minor child), vs Whetstone Academy, Case No.: 8:21-cv-01955-TMC. Defendant Singleton Investment Properties in this matter is the landowner and premises owner where Whetstone Academy was located. The related matter, Father Doe and Mother Doe, Individually, and as next of friend for John Doe, (a minor child), vs Whetstone Academy, Case No.: 8:21-cv-01955-TMC is closed.

- F. N/A [Defendants only]
- G. N/A [Defendants only]
- H. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court order otherwise, name and identify the citizenship of every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later events occurs that could affect the court's jurisdiction under § 1332(a).

ANSWER: Father Doe, Mother Doe, and John Doe are United States Citizens and are citizens and residents of the State of Alabama.

[SIGNATURE BLOCK ON THE FOLLOWING PAGE]

s/Tyler D. Bailey
Federal ID #12294
BAILEY LAW FIRM, L.L.C.
Attorney for Plaintiff
1921 Henderson Street (29201)
P.O. Box 532
Columbia, South Carolina 29202
Telephone: (803) 667-9716

Fax: 1-803-526-7642

Email: tyler@baileylawfirmsc.com

Anderson, South Carolina